

13

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

20-cr-20187

v.

Hon. Linda V. Parker
United States District Judge

BILLY ARNOLD,

a/k/a "B-Man," "Berenzo,"
"Killa"

18 U.S.C. § 1959(a)(5);
18 U.S.C. § 924(c);
18 U.S.C. § 2

/

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

F I L E D
JUN 10 2020
CLERK'S OFFICE
U.S. DISTRICT COURT

COUNT ONE

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

The Enterprise

1. The Seven Mile Bloods, commonly referred to as, and hereinafter referred to as, "SMB", were a street gang that operated primarily on the east side of Detroit, Eastern District of Michigan, specifically the area in and around Gratiot Avenue to the west, Kelly Road to the east, Eight Mile Road to the north, and Seven Mile Road to the south. SMB members claimed this area as their territory and refer to it as the "Red Zone". The main streets in the area that SMB conducted many of their illegal activities are Lappin,

Coram, Novara, Liberal, Manning, and Tacoma. This particular area of Detroit's zip code is 48205, which SMB members and associates often referred to as "4-8-2-0-Die".

2. In addition to the members who directly claimed SMB, the enterprise also consisted of subsets that were affiliated with the gang, such as "55" and "SMB Jrs", who changed its name to "Hobsquad" in honor of SMB Jr. member Ihab Masalmani who was convicted of murder.

3. SMB members and associates utilized a variety of unifying marks, manners, and identifiers, including "gang signs," clothing, and tattoos that were specific to the organization. SMB colors were predominately red, which the gang members and associates signified by wearing red clothing, hats, and bandanas. A common symbol was the five-pointed star, a hand sign with all five fingers, or a crown with five points, which represented the fact that SMB based itself on the Bloods founded in Los Angeles, California, which belonged to the "People Nation", an alliance of various street gangs.

4. SMB members and associates also utilized the number "762", which stands for the numbers on a keypad that a person would push to type out SMB, and "19 13 2" which represented the numerical order in the alphabet for the letters SMB. Members would often tattoo themselves with these gang symbols. SMB members also used hand signals to show their

identification with SMB. For example, SMB members would hold their thumb and fingers in a manner that resembled the letter “b” which stands for “Blood”. SMB members and associates regularly used social networking websites such as Facebook, Instagram, and YouTube, to post photographs, videos, and statements that identified and highlighted their affiliation with the enterprise, as well as their gang-related accomplishments, thereby glorifying and perpetuating SMB. SMB was also involved in the rap music scene. SMB members and associates regularly posted videos of their rap music and discussed their gang affiliation and accomplishments via rap.

5. SMB members and associates frequently used cellular telephones to communicate with each other about their criminal activities, take and share pictures of themselves associating with each other, and save and share images and statements posted by rival gang members and associates on social media platforms.

6. SMB made its money predominately through the sale and distribution of controlled substances, including cocaine, heroin, marijuana, codeine promethazine, and various prescription pills. SMB members and associates sold these controlled substances within the “Red Zone,” utilizing vacant houses known as “trap houses.” SMB members would often sell on the same block of Manning Street, sharing workers and firearms to distribute

and protect their narcotics and territory. SMB members and associates also worked with each other travelling to, and recruiting others to travel to, West Virginia, Ohio, Kentucky, and other states to sell controlled substances.

7. SMB were rivals with several other street gangs, including Hustle Boyz, East Warren, Six Mile Chedda Ave, Gutta Boys, Gangster Disciples, and the Crips. Many of SMB symbols, clothing, and sayings attempted to differentiate themselves from, or disrespect, their rivals. Because they were rivals with Crips, during communications, SMB members would replace the first letter of words beginning with a “C” with a “B”. For example, the word “Cool” would be changed to “Bool”.

8. As a way of showing disrespect towards rival gangs, SMB members used hand signs which they posted on social media. For example, to disrespect Hustle Boyz, who also go by “42”, SMB members would pose for pictures holding four fingers on one or both hands, or four fingers on one hand and two fingers in the other hand, in a down position to signal “dropping 4s” or “dropping 42s”. “Dropping” was a SMB reference to killing.

9. SMB members and associates worked together against rival gangs to defend, promote, and maintain the status and reputation of SMB and to retaliate with threats and acts of violence for perceived wrongs, frequently with the use of firearms.

10. From 2008 through September 2015, SMB was in a gang war off and on with other gangs operating in Detroit. While the rivalries between SMB and other gangs had existed for some time, the murder of a rival gang member on July 14, 2014 by SMB members exacerbated the tension between the gangs and led to an alliance of rival gangs including, but not limited to, Hustle Boyz, East Warren, Six Mile Chedda Ave, and Gutta Boys, against SMB. Between July 2014 and September 2015, SMB and these rival gangs violently attacked one another and posted respective “hit lists” on social media, which led to multiple murders and shootings.

11. At all times relevant to this Indictment, in the Eastern District of Michigan, and elsewhere, SMB, including its leadership, members, and associates, constituted an enterprise, as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

12. At times relevant to this Indictment, BILLY ARNOLD, and others, were members and associates of SMB.

Purposes of the Enterprise

13. The purposes of the enterprise included the following:

- a. Promoting and enhancing the enterprise and its members' and associates' activities, including narcotics distribution and acts of violence;
- b. Preserving and protecting the power, territory, reputation, and profits of the enterprise through the use of intimidation and violence, including assaults and threats of violence;
- c. Confronting and retaliating against rival gangs through the use of intimidation, threats of violence, and acts of violence;
- d. Maximizing profits for enterprise members from a variety of illegal activity, including narcotics distribution;
- e. Sharing and disseminating information about the plans and activities of the enterprise and its members and associates;
- f. Keeping victims, potential witnesses, and community members in fear of the enterprise and in fear of its members and associates through violence, intimidation, and threats of violence;
- g. Providing assistance to members and associates of the enterprise who committed crimes in order to hinder, obstruct, and prevent law enforcement authorities from successfully prosecuting the offenders.

Manner and Means of the Enterprise

14. The manner and means used by the enterprise to further the goals of the enterprise and achieve its purposes included, but was not limited to, the following:

- a. Members of the enterprise and their associates committed, conspired, attempted and threatened to commit acts of violence including acts involving murder, attempted murder, and assaults with dangerous weapons to promote and enhance the enterprise and its members and to preserve, protect, and expand the power and reputation of the enterprise and its members;
- b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence;
- c. Members of the enterprise and their associates used and threatened to use physical violence against various individuals;
- d. Members of the enterprise and their associates distributed controlled substances and transported and distributed proceeds from the sale of controlled substances;
- e. Members of the enterprise and their associates wore clothing and displayed hand signs signifying their affiliation with the enterprise and posted statements and pictures to social media platforms in

which they affiliated themselves with the enterprise, often while in the company of other enterprise members and associates;

f. Members of the enterprise and their associates frequently armed themselves with firearms to commit crimes and to project a violent attitude toward rival gang members and the community, often boasting on social media platforms about their possession of firearms, posting pictures of the firearms, and making statements about their willingness to use firearms;

g. Enterprise members and associates shared firearms and stored firearms for one another; and

h. Enterprise members and associates communicated with each other in person and by cell phone and social media platforms to plan, discuss, and coordinate criminal activities, and to receive direction, support, and encouragement for carrying out criminal activities.

15. SMB, through its members and associates, engaged in racketeering activity as defined by Sections 1959(b)(1) and 1961(1) of Title 18, United States Code, namely:

a. Threats and acts involving murder, in violation of Michigan Compiled Laws, Sections 750.316(1), 750.83, 750.157a(a), and 767.39;

- b. Threats and acts involving robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.530, 750.157a(a), 750.92, and 767.39;
- c. Offenses involving conspiracy to distribute and distribution of controlled substances in violation of Title 21, United States Code, Sections 841 and 846; and
- d. Acts indictable under Title 18, United States Code, Section 1512 (witness intimidation).

16. On or about May 10, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and others known and unknown, aided and abetted by each other, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempted to murder D.P.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWO

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One – Sixteen of Count One are re-alleged herein as if fully incorporated in this Count.
2. On or about May 10, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, and others, known and unknown, aided and abetted by each other, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempted to murder D.C.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT THREE

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One – Sixteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 10, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, and others known and unknown, aided and abetted by each other, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempted to murder J.G.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FOUR

18 U.S.C. §§ 924(c); 2 – *Use, Carry, and Discharge of a Firearm During, and in Relation to, a Crime of Violence*

D-1 BILLY ARNOLD

On or about May 10, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD and others known and unknown, aided and abetted by each, knowingly, intentionally, and unlawfully carried

and used a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering, as alleged in Counts One through Three, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

ERIC STRAUS
Chief, Violent and Organized Crime Unit

s/ A. Tare Wigod
A. TARE WIGOD
MARK S. BILKOVIC
RAJESH PRASAD
Assistant United States Attorneys

Dated: June 10, 2020

C I L E D

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet JUN 10 2020 CLERK'S OFFICE U.S. DISTRICT COURT	Case Number 20-cr-20187
--	---	----------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number: 15-cr-20652
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned: Steeh
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	AUSA's Initials: <u>s/ Tare Wigod</u>

Case Title: USA v. BILLY ARNOLD

County where offense occurred : Wayne

Check One: **Felony** **Misdemeanor** **Petty**

Indictment/ Information --- no prior complaint.

Indictment/ Information --- based upon prior complaint [Case number:]

Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 20-cr-20187

Judge: Linda V. Parker

Corrects errors; no additional charges or defendants.

Involves, for plea purposes, different charges or adds counts.

Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
BILLY ARNOLD	18 U.S.C. § 1959(a)(5); 18 U.S.C. § 924(c); 18 U.S.C. § 2	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 10, 2020

Date

s/ Tare Wigod

Tare Wigod
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3277
Phone: (313) 226-9191
Fax: (313) 226-5464
E-Mail address: Tare.Wigod@usdoj.gov
Attorney Bar #: P58479

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.